CONFIDENTIAL

DECLARATION OF DR. PAUL R. PATEK, PH.D.

My name is Dr. Paul R. Patek. I make this following declaration under the penalty of perjury.

I hold the degree of Doctor of Philosophy (Ph. D.) in anatomy and biological sciences , graduating from the University of Southern California in 1938.

I am presently Professor and Chairman of the Department of Anatomy in the University of Southern California School of Medicine, 2025 Zonal Avenue, Los Angeles, California.

In addition, I am currently active and have been active in the past in research in the ~~field~~ field of ~~Gross~~ microscopic Anatomy and have published numerous papers dealing with that subject.

In my capacity as Professor and Chairman of the Department of Anatomy in the School of Medicine in the University of Southern California, I am familiar with all of the Courses of our department, and have become familiar with other courses in the department of Biology at the University of Southern California, particularly those which deal with Human Anatomy.

The only course at the University of Southern California which involves students dissecting individual Human Cadavers is Anatomy 501, Gross Human Anatomy, which is a complete dissection of the Adult Human Body. In this Course, 4 (four) students are assigned to one cadaver; and in this course personally dissect the Human Body. The assignment of 4 (four) students to a body is a standard assignment throughoutthe Medical Schools in the United States, a fact with which I am personally familiar. I know of no standard recognized course in Human Gross Anatomy, other than in perhaps individual research in Human Gross Anatomy, where the individual dissection is conducted by the students where as few as only 2 (two) students dissect on each body; such 2 (two) students per body dissection would not be in keeping with efficient

and economical use of cadavers, which are, at least periodically, in short supply in many areas of the United States.

I have, at the request of Roger S. Hanson, Attorney at Law, examined the undergraduate University of Southern California academic transcript of one DE WAYNE ALLEN WOLFER , and I note thereon a course he completed in the 1949-1950 academic year entitled Zoology 312, a four (4) semester credit course, called Human Anatomy, for which he received a grade of B.

I have examined the appropriate pages of the 1949-1950 general catalog of the University of Southern California, setting forth course offerings of the Department of Zoology. I note at page 86 (see attached Xeroxed pages) Zoology Course 312, "Human Anatomy". This is the course completed by Mr. Wolfer. It consisted of lectures and perhaps four(4) or five (5) demonstrations each year, conducted by graduate students in the anatomy department. This course was taught at that time by Professor Baldwin, now deceased.

In support of the above, I append to this declaration all relevant materials that I have consulted in arriving at my statements contained above and below.

There appears to be no other course on Mr. Wolfer's academic record dealing with Human Gross Anatomy other than Zoology 312, and I am personally familiar with the contents of the other courses connected with the Biological sciences for which he has received credit during his undergraduate career at the University of Southern California. None others deal with Human Gross Anatomy. This course that he completed, Zoology 312, was given primarily for physical education majors. It was a superficial, cursory course compared to the standard dissection course 501 Gross Human Anatomy given under my direction at the University of Southern California Department of Anatomy. The 501 course is the customary course given to Medical Students and

graduate students in the field of Anatomy. A single cadaver was used for the ENTIRE class in Zoology 312, and usually about 30 students enrolled, although this amount varied. In this course, Zoology 312, individual class students such as Mr. Wolfer did not personally participate in the dissection of that single cadaver. In no sense would "two students" be assigned to dissect that single cadaver in Zoology 312.

In this respect, I have personally examined page 8375, lines 10-18 of People v. Jack Kirschke, and can state that the testimony given by Mr. Wolfer where he claims "two men were assigned a cadaver and we dissected the entire cadaver from top to bottom," is FALSE and not TRUE and is contrary to my personal knowledge of the content of Zoology 312 as taught by Professor Baldwin in 1949-1950.

In fact, the single cadaver used in Zoology 312 was never totally dissected, being used for two or more years.

All dissections in Zoology 312 were done by Dr. Baldwin's graduate students ONLY, and these graduate students did most of the demonstrations for the students enrolled in that course.

In addition, I have personally examined the testimony adduced in the Reporter's Partial Transcript at pages 13-15 of People v. Albert Maurice Hodge, Number 92475, Santa Barbara County Superior Court, given by Mr. Wolfer. This document is herewith appended. I find this testimony FALSE for the same reasons set forth above, viz:

(1) Never were 2 (two) students only assigned to the Human Body for dissection purposes (lines 12-28, page 12).

(2) The dissection was not done in a six (6) foot by two (2) foot room, and there was no need nor opportunity for the undergraduate students such as Mr. Wolfer to "go to lunch with embalming fluid on their hands;" these students in Zoology

312, the previously mentioned course completed by Mr. Wolfer, did not personally participate in the dissection of the single cadaver used in this course, Zoology 312.

There are, furthermore, no rooms of size six (6) feet by two (2) feet designed and used for dissecting of cadavers. In Zoology 312, the room was sufficient in size to allow and to accomodate numerous students in a demonstration surrounding.

Further, I have examined the testimony given under oath by De Wayne Allen Wolfer in his deposition taken in the case C-8080, Wolfer v. Blehr, a copy of which is being lodged with this Court as an Exhibit, and I find much of the testimony false at pages 72-78 which was given by Mr. Wolfer, for the foregoing reasons which I have heretofore set forth.

In conclusion, it appears to me that the person Mr. Wolfer who is testifying to procedures used in Human Gross Anatomy courses alledgedly taken by himself at the University of Southern California is quite unfamiliar with the methods and techniques used in those dissection/ and/ or demonstration courses, or he otherwise wilfully proffers false testimony whenever he has testified.

It is my opinion that Mr. Wolfer never participated in a Human Gross Anatomy Course at the University of Southern California where he, along with another student, personally dissected a Human Cadaver.

Under the penalty of perjury I declare the foregoing to be true and correct this_____day of June, 1972.

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Paul R. Patek

Professor of Anatomy and Chairman of the Department

University of Southern California School of Medicine